

J. MICHAEL KALER, SBN 158296
KALER LAW OFFICES
9930 Mesa Rim Road, Suite 200
San Diego, California 92121
Telephone (858) 362-3151
Email: michael@kalerlaw.com

MELODY A. KRAMER, SBN 169984
KRAMER LAW OFFICE
9930 Mesa Rim Road, Suite 1600
San Diego, California 92121
Telephone (858) 362-3150
Email: mak@kramerlawip.com

Attorneys for Plaintiff JENS ERIK SORENSEN,
as Trustee of SORENSEN RESEARCH AND
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JENS ERIK SORENSEN, as Trustee of) Case No. C08-00095 JW
SORENSEN RESEARCH AND)
DEVELOPMENT TRUST,)
Plaintiff) **NOTICE OF NEWLY DISCOVERED**
v.) **PRODUCTS ACCUSED OF PATENT**
LEXAR MEDIA, INC., a Delaware) **INFRINGEMENT IN THIS ACTION**
corporation; and DOES 1 – 100,)
Defendants.)
and related counterclaims.)
})

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4 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
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6 **PLEASE TAKE NOTICE THAT** Plaintiff JENS E. SORENSEN, as
7 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST
8 (“SRDT”), by and through its attorneys of record, is hereby providing this notice to
9 the Court and all interested parties of the discovery of additional newly discovered
10 Accused Products manufactured, imported, offered for sale or sold in the United
11 States by Defendants during the relevant period of time, that are substantially likely
12 to be produced utilizing a process that infringes United States Patent Number
13 4,935,184 (“the ‘184 patent”).
14

15 Pursuant to paragraph 10 of the Complaint, these additional Accused Products
16 and the processes utilized to manufacture them are now at issue for infringement of
17 the ‘184 patent in the present action. Paragraph 10 provides in relevant part that
18 Accused Products are those “including but not limited to, any other product
19 manufactured using the same injection mold as” the LEXAR MEDIA JumpDrive
20 128MB. The plastic cases of all the newly identified Accused Products appear to be
21 the same case manufactured with the same mold as the LEXAR MEDIA JumpDrive
22 128MB.
23

24 This notice adds additional newly discovered Accused Products that were not
25 known to Plaintiff at the time of the filing of the complaint.
26

27 The newly discovered Accused Products are identified by product number in
28 the table below:

MODEL NUMBER
LEXAR MEDIA JumpDrive 64MB
LEXAR MEDIA JumpDrive 256MB
LEXAR MEDIA JumpDrive 512MB
LEXAR MEDIA JumpDrive 1GB

DATED this Thursday, July 10, 2008.

JENS ERIK SORENSEN, as Trustee of
SORENSEN RESEARCH AND DEVELOPMENT
TRUST, Plaintiff

/s/ J. Michael Kaler

J. Michael Kaler, Esq.
Melody A. Kramer, Esq.
Attorney for Plaintiff

PROOF OF SERVICE

I, J. Michael Kaler, declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kaler Law Offices, 9930 Mesa Rim Road, Suite 200, San Diego, California, 92121.

On Thursday, July 10, 2008, I served the following documents:

**NOTICE OF NEWLY DISCOVERED PRODUCTS ACCUSED OF PATENT
INFRINGEMENT IN THIS ACTION**

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Jared Bobrow jared.bobrow@weil.com Weil, Gotshal & Manges LLP 201 Redwood Shores Parkway Redwood Shores, CA 94065	Lexar Media, Inc.	Email--Pleadings Filed with the Court via CM/ECF

- (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.
 - (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.
 - (Facsimile) I caused a true copy of the foregoing documents to be transmitted by facsimile machine to the above noted addressees. The facsimile transmissions were reported as complete and without error.
 - (Email) I emailed a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee.
 - (Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.
 - (U.S. Mail) I mailed a true copy of the foregoing documents to a mail address represented to be the correct mail address for the above noted addressee.

1 I declare that the foregoing is true and correct, and that this declaration was executed on
2 Thursday, July 10, 2008, in San Diego, California.

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4 /s/ J. Michael Kaler
5 J. Michael Kaler
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